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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
(LAS VEGAS)

TOD ARMSTRONG,

Plaintiff,

v.

MARTIN O'MALLEY,
Commissioner of Social Security,

Defendant.

Case No.: 2:24-cv-00049-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
CERTIFIED ADMINISTRATIVE
RECORD
(FIRST REQUEST)**

Defendant, Martin O'Malley, Commissioner of Social Security (the "Commissioner"), by and through her undersigned attorneys, hereby moves for a 36-day extension of time to file the Certified Administrative Record (CAR) to Plaintiff's Complaint. The CAR to Plaintiff's Complaint is due to be filed by March 5, 2024. This is Defendant's first request for an extension of time. Defendant requests this extension because Defendant has been notified that the CAR is not yet available due to system

1 issues in this case and that additional time is needed to prepare it. Defendant therefore cannot respond
2 to Plaintiff's Complaint. Once the CAR arrives, Defendant will need to review it for defects before
3 submitting it.

4 For these reasons, Defendant requests an extension in which to respond to the Complaint until
5 April 10, 2024.

6 On February 27, 2024, the undersigned conferred with Plaintiff's counsel, who has no opposition
7 to the requested extension.

8 It is therefore respectfully requested that Defendant be granted an extension of time to file the
9 CAR to Plaintiff's Complaint, through and including April 10, 2024.

11 Dated: February 27, 2024

Respectfully submitted,

13 JASON M. FRIERSON
United States Attorney

14 /s/ Franco L. Becia
15 FRANCO L. BECIA
Special Assistant United States Attorney

18 IT IS SO ORDERED:

19 
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 2/28/2024
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing to:

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 1, 2024

/s/ Franco L. Becia
Franco L. Becia
Special Assistant United States Attorney